

Inspector Statement

C.R. Leffler-Tuckerton Terminal (PA-FRP-079)  
4030 Pottsville Pike  
Reading, PA 19605

Inspector: Michael Welsh

The Tuckerton Terminal facility in question was targeted by EPA in April of 1996 after a tip from a caller. The facility was inspected on July 16, 1996 by Michael Welsh and Glenn Lapsley. The terminal manager for the facility at the time of the inspection was Stephen Long (Phone:(610)921-2016). During the inspection the following violations were noted:

- The tank truck loading rack had insufficient containment for the largest truck compartment.
- No written inspections were kept.
- No periodic spill briefings were conducted.
- No Certification of Substantial Harm was provided with the SPCC Plan. A blank Certification of Substantial Harm form was provided by the inspectors to Stephen long during the inspection.
- No Facility Response Plan was available.

Berks Fuel Storage, Inc., located at 124 Witman Road, Reading, PA, was inspected after C.R. Leffler on July 16, 1997. Berks Fuel Storage, Inc. also did not have a Facility Response Plan prepared but determined through the Certification of Substantial Harm Form that it was required and hired a contractor to prepare one.

The C.R. Leffler and Berks Fuel Storage facilities are located in the same general area of the following facilities which have prepared Facility Response Plans:

- PA-FRP-043 Mobil Oil Corporation (Closed per 6/1/95 Ltr)  
(NON-FRP) 3920 Pottsville Pike, Reading, PA
- PA-FRP-060 Pipeline Petroleum Inc.  
(SIG/SUB) 4025 Pottsville Pike, Reading, PA
- PA-FRP-145 Koch Materials Company  
(SUB) 3847 Pottsville Pike, Reading, PA

The SPCC Plan for C.R. Leffler-Tuckerton Terminal was received on July 29, 1997. The Plan review revealed problems in the drainage, buried piping protection, and tank truck loading/unloading. The completed Certification of Substantial Harm form was included with the Plan. The completed form shows that there was consideration as to the harm since it was checked "YES" to a few questions; but, the form was subsequently whited-out and changed to "NO". An FRP plan was never prepared or scheduled to be prepared for this facility.

An SPCC Notice of Non-Compliance (NON) was issued on July 31, 1996 (Case Number PA-96-038). Correspondence and a new SPCC Plan was received on October 22, 1996 from Mr. Robert Stewart ((717)866-2105) which addressed violations cited in the NON and set a schedule for sufficient containment for the loading rack to be installed by December of 1996. The facility encountered problems with the installation, but completion was accomplished on February 24, 1997. No Certification of Substantial Harm form was provided in the new SPCC plan.

  
Michael Welsh, SPCC/FRP INSPECTOR